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March 20, 2023

VIA CM/ECF & ELECTRONIC MAIL

Hon. Jennifer H. Rearden
United States Court
500 Pearl Street, Room 1010
New York, New York 10007
ReardenNYSDChambers@nysd.us.courts.gov

Re: *United States et al. v. Voyager Digital Holdings et al.*, No. 23 Civ. 2171 (JHR)
(Bankruptcy Appeal)

Dear Judge Rearden:

We represent appellee Voyager Digital Holdings, Inc. and its affiliated Debtors (collectively, the “Debtors”) in the above captioned action. We write pursuant to Rule 5.B of Your Honor’s individual rules and practices to respectfully request leave to file a memorandum in excess of the 25-page limit set by the Court.

On March 17, 2023, the appellants United States Attorney for the Southern District of New York (the “USAO”) and the United States Trustee (the “U.S. Trustee” and together with the U.S. Attorney the “Government”) appealed the Bankruptcy Court’s order denying their motion to stay confirmation of the Debtors’ Chapter 11 plan, pending appeal. (Dkt. No. 3.) In connection with the motion, the Government filed an application requesting an increase to the word limit under Federal Rule of Bankruptcy Court Procedure 8013(f)(3)(A), from 5,200 words to 12,674 words.

Given the excess size of the Government’s motion and memorandum of law, the Debtors also request permission to exceed the 25-page limit in order to fully respond to the Government’s arguments. Absent such permission, the Debtors would be forced to leave some of the Government’s arguments incompletely addressed.

Counsel for the Debtors conferred with counsel for the Government regarding this request and they indicated that they consent to the request.

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Hon. Jennifer H. Rearden
March 20, 2023
Page 2

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Lamina Bowen

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